

From: [McCarter, Jennifer](#)
To: [Jacobson, Linda](#)
Cc: [Kilty, Quinn V](#)
Subject: RE: request for more details on costs
Date: Thursday, December 23, 2021 8:39:49 AM

Hi Linda, I'm sorry for the delayed reply. I was in the field yesterday and will be again today sampling the Valmont Rd. domestic wells and I won't have email access. I don't have additional detail readily available and have some questions about what type of detail you are seeking. The easiest way for us to approach #4 & #6 is to provide an estimated cost to sample one well in 2021, which you can then extrapolate as you need to; will that work? For #8, could you explain what additional detail you'd like for the statistical evaluation? I'll be able to check my emails later today. Thanks,

Jennifer McCarter, R.E.M.

Xcel Energy

Environmental Analyst

Environmental Services Department

1800 Larimer St., Suite 1300, Denver, CO 80202-1414

P: 303-294-2228 C: 720-810-1220 F: 303-294-2328

E: jennifer.mccarter@xcelenergy.com

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I am working remotely. Please contact me through email or cell (720) 810-1220

From: Jacobson, Linda <Jacobson.Linda@epa.gov>
Sent: Tuesday, December 21, 2021 10:47 AM
To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Subject: request for more details on costs

EXTERNAL - STOP & THINK before opening links and attachments.

Hi, Jennifer,

I know that you are dealing with other matters. I am hoping that you could provide more details regarding the costs in Numbers 4, 6 and 8 in your response (see email below). I will be preparing a draft penalty and would appreciate getting those costs, if they have already been pulled together.

Thank you.

Linda Jacobson

From: Jacobson, Linda
Sent: Thursday, December 16, 2021 3:34 PM
To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Subject: RE: a few questions and request for cost information - PSCo response Dec 10, 2021

Hi, Jennifer,

For numbers 4, 6, and 8 in the attachment that you sent, would you please provide the breakdown of the costs rather than the cumulative estimate. Thank you.

Linda Jacobson

From: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Sent: Friday, December 10, 2021 8:09 PM
To: Jacobson, Linda <Jacobson.Linda@epa.gov>
Cc: Figur, Charles (he/him) <Figur.Charles@epa.gov>; Pearson, Janice (she/her/hers) <pearson.janice@epa.gov>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>
Subject: RE: a few questions and request for cost information - PSCo response Dec 10, 2021

Hi Linda, attached is our response to your questions which you sent via email on November 19, 2021. For your convenience I have included the responses I sent on November 19th to some of the questions, so that all of the questions and answers are in one document. The earlier responses are in red, and where that text is highlighted, it is to clarify the dates since my original email used terms such as 'today' or 'next week' which are no longer accurate as of December 10, 2021. The newly added responses are in blue. Please let us know if you have any questions.

Sincerely,

Jennifer McCarter, R.E.M.
Xcel Energy
Environmental Analyst
Environmental Services Department
1800 Larimer St., Suite 1300, Denver, CO 80202-1414
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I am working remotely. Please contact me through email or cell (720) 810-1220

From: Jacobson, Linda <Jacobson.Linda@epa.gov>
Sent: Monday, November 29, 2021 5:19 PM
To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Cc: Figur, Charles <Figur.Charles@epa.gov>; Pearson, Janice (she/her/hers) <pearson.janice@epa.gov>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>; Churchill, Stephen <Churchill.Stephen@epa.gov>; Bailey, Treasure <Bailey.Treasure@epa.gov>
Subject: RE: a few questions and request for cost information

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Thank you for the update on the timing of your submission of the requested cost information. Steve Churchill has had an opportunity to review the information in your November 5, 2021 letter; based on his review, we will be requesting additional clarifications regarding your statistical procedures. We will also be providing you our position on your proposed five-week frequency for sampling of the new wells. We hope to be providing you any additional questions or requests within the next few days, allowing you to provide any responsive information in your December 10 submittal.

Our new attorney for this matter, Chuck Figur, would like to introduce himself to counsel for Xcel and briefly discuss the administrative process. Please ask your counsel to contact Chuck at his earliest convenience to schedule a call. Email works best these days. Chuck's contact information is figur.charles@epa.gov and phone: 303-312-6915.

We appreciate your ongoing cooperation.

Best regards,

Linda Jacobson

From: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Sent: Monday, November 29, 2021 4:23 PM
To: Jacobson, Linda <Jacobson.Linda@epa.gov>
Cc: Figur, Charles <Figur.Charles@epa.gov>; Pearson, Janice (she/her/hers) <pearson.janice@epa.gov>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>
Subject: RE: a few questions and request for cost information

Hello Linda, we are working on compiling the additional information in response to your 11/19 email request. Given the holiday last week and many people with specific technical/financial input out most or all of the week, we would like to have until Dec. 10th to provide all of the outstanding information. We will make every effort to improve on this schedule and provide sooner if possible.

Sincerely,

Jennifer McCarter, R.E.M.
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I am working remotely. Please contact me through email or cell (720) 810-1220

From: Jacobson, Linda <Jacobson.Linda@epa.gov>
Sent: Friday, November 19, 2021 5:42 PM
To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Cc: Figur, Charles <Figur.Charles@epa.gov>; Pearson, Janice (she/her/hers) <pearson.janice@epa.gov>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>
Subject: RE: a few questions and request for cost information

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From: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>
Sent: Friday, November 19, 2021 5:33 PM
To: Jacobson, Linda <Jacobson.Linda@epa.gov>
Cc: Figur, Charles <Figur.Charles@epa.gov>; Pearson, Janice (she/her/hers) <pearson.janice@epa.gov>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>
Subject: RE: a few questions and request for cost information

Hi Linda, I'm responding to your first two questions, and will respond to the others in a follow up email by November 29th.

The drilling has been going well, summary below.

- New landfill well MW-7 is screened at 26-36 ft in weathered shale, water level 18.04 ft bgs with good recharge. All landfill wells have been sampled and delivered to lab today.
- Two of three new wells associated with the bottom ash pond (W-2C and W-6B) have been installed. Well W3-B is scheduled to be drilled next week followed by development and sampling of all impoundment wells. The water levels in these first two wells is still stabilizing, but latest depths to water are provided below.
 - W-2C additional background well was set at 24-34 ft bgs with 2ft of filter pack over the screen, all within weathered shale
 - W-6B was set in weathered shale at 32-42 ft bgs
 - Water levels in new impoundment wells, and existing paired wells (ft bgs) as follows:
 - W-2A - 24.57
 - W-2C - 25.50
 - W-6 - 6.32
 - W-6B - 12.57

Regarding the assessment monitoring, the cobalt and molybdenum SSLs are based on calculated lower confident limits (LCL) per the statistical procedures plan. The current LCL values which incorporate the May/June sample results are shown below. The LCL values will be updated as additional sample results are received. Documentation of the determination of SSLs over GPS was placed into the operating record today and will be posted to the CCR website and notification made to the state as soon as possible, and in advance of the 30-day deadline.

W-7 Cobalt

- LCL of 0.016 mg/l vs GPS (BTV) of 0.0102 mg/l

W-6 Molybdenum

- LCL of 0.298 mg/l vs GPS (MCL) of 0.1 mg/l
- Note that this well is completed in colluvium, not weathered shale

Also, in our November 5th letter we informed EPA that the first assessment monitoring result in W-12 had a non-statistical concentration exceedance of cobalt over the GPS. There are only three samples to date from this well which is not sufficient to calculate a statistical LCL. However, we do want to update you that the cobalt concentration from the most recent May sample was also above the GPS. Cobalt concentrations in the three samples to date have ranged from 0.22 mg/l to 0.29 mg/l

Sincerely,

Jennifer McCarter, R.E.M.

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I am working remotely. Please contact me through email or cell (720) 810-1220

From: Jacobson, Linda <Jacobson.Linda@epa.gov>

Sent: Friday, November 19, 2021 10:27 AM

To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>; Kilty, Quinn V <quinn.v.kilty@xcelenergy.com>

Cc: Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Figur, Charles <Figur.Charles@epa.gov>; Pearson, Janice (she/her/hers) <pearson.janice@epa.gov>

Subject: a few questions and request for cost information

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I have a few questions and some requests regarding costs expended to date. First, were there any issues encountered during the well drilling the week of November 8? Were you able to place the wells in the proposed locations and did they have good recovery? If not, could you provide specifics.

The Xcel November 5, 2021 letter from Mr. Kilty to Ms. Pearson, on page 6, indicates that you have identified SSIs for cobalt and molybdenum; but, it doesn't list the levels detected that are SSIs or the GPS being exceeded? Could you please provide me those levels?

Could you please provide some of the major milestones for the closure of the Bottom Ash Pond and

the operation of the new treatment system. Also are any materials being placed in the pond now and what are the plans for construction of a new lined pond?

Regarding costs, please provide the following cost items to me by November 29:

1. Identify the cheapest method to attain the cease receipt date of April 11, 2021;
2. Both capital and operating cost of the packaged plant system as a stand-alone system, assuming that the installation and operation of the temporary system was not required and the date the packaged plant came online;
3. Both capital and operating cost for the temporary system and the timeframe in which it was operated;
4. Well installation costs for new wells installed in 2020 and 2021 to allow appropriate required monitoring;
5. Report preparation for annual reports required to be posted on the public website;
6. Sampling costs per round of missed sampling, including sample collection, lab analysis, QA/QC of data, report preparation for Appendix III and Appendix IV constituents, as they move into assessment monitoring?);
7. Cost for CPDES permit modification;
8. Costs to select and develop statistical analyses of collected data.

Please let me know if you have questions on this email or any related matter. Thank you.

Best regards,

Linda Jacobson